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GULFCO MARINE MAINTENANCE SUPERFUND SITE

REMOVAL ACTION WORK PLAN

JANUARY 14, 2010

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I. INTRODUCTION

A. Purpose of the Work Plan

This Work Plan sets forth certain requirements for completion of a removal action to remove or eliminate certain wastes, and to repair the cap over the former surface impoundments, thereby eliminating or reducing risks from potential exposure pathways from those wastes at or from the Gulfco Marine Maintenance Superfund Site (the "Site"). The work described herein shall be implemented upon EPA's signing of the Administrative Settlement Agreement and Order on Consent for Removal Action (AOC).

B. Description of Action

Aboveground Storage Tank Farm

An aboveground storage tank farm ("AST Tank Farm") located in the southern portion is to be addressed by this Removal Action. The AST Tank Farm is a concrete bermed area containing 14 above-ground storage tanks, three of which appear to be empty. The tank locations and designations are shown on Figure 1. The contents of the tanks are to be removed and the tanks demolished. The concrete containment slab and walls will remain in place, except that the walls shall be breached so that rainfall will freely drain from the structure. Any accumulated water contained within the bermed area shall be characterized and properly managed. Any buried pipes will be capped at the surface after removing the contents of the pipes. The tanks' contents and structures, containerized wastes, and debris will be properly managed off-site.

The specific objectives for the AST Tank Farm Removal Action are: (1) to prevent the release of chemicals of concern that are stored in the tanks and any other containers, and (2) to prevent the exposure of site workers and visitors to chemicals of concern remaining in the tanks following removal of the stored liquids and other materials. The tanks contain water, various organic phases, oily sludges, and sand, rust solids, and debris. The tanks' contents include: benzene; chloroform; 1,2-dichloroethane; trichloroethylene; tetrachloroethylene; vinyl chloride; and petroleum hydrocarbons in various concentrations.

Former Surface Impoundments Cap

The former surface impoundments were three earthen pits with natural clay liners located on Lot 56 on the north side of Marlin Avenue. The impoundments were reportedly used for storage of waste oils, caustics, various organic chemicals, and waste wash waters generated during barge cleaning activities. The impoundments were deactivated in October 1981 and closed in 1982. Closure activities included removal of the liquids and the majority of the sludges. The remaining sludges were solidified with

soil, which resulted in approximately 100 cubic yards of solidified sludge left in place. The former impoundments were then capped with 3-feet of clay cover and a hard wearing surface (shell). The cover was recently found to be between 2.5-feet and 3.6-feet thick, and was rutted on the western end.

The objective for the cap repair is to protect the cap's integrity by reestablishing the 3-foot thickness of the clay cover, repairing the ruts, and providing adequate erosion protection over and drainage from the cap. Specifically, the cap repair will include removing the existing vegetative cover and hard wearing surface, and reestablishing the 3-foot thickness of the clay cover with material that does not exceed a hydraulic conductivity of 1×10^{-7} cm/sec. The cap will be sloped to provide adequate drainage, and provisions will be included to provide erosion protection for the cap.

II. WORK TO BE PERFORMED – AST TANK FARM

A. Preconstruction Activities

Preconstruction activities will consist of a Site inspection and assessment, and preparation of a Health and Safety Plan (HASP). The HASP will be prepared in compliance with Occupational Safety and Health Administration and EPA requirements. The HASP will be submitted to EPA and will be in place prior to any onsite construction activities. Site inspection and assessment shall begin with cutting weeds and vegetation as necessary to perform a visual inspection of the removal action area. This inspection shall be performed for safety purposes and to identify any drums or containers, which shall be visually inspected, inventoried, labeled with a control number, and logged, as necessary.

Sampling and Analysis Plan

Sampling of the AST contents was performed during the period from December 14 through 15, 2006 in accordance with a Work Plan dated November 6, 2006 (and addendum dated December 1, 2006) that were approved by an EPA letter dated December 4, 2006. As part of sampling activities, fluid levels were gauged in all ASTs and samples were collected from separate solid and liquid phases within the tanks, where present. In addition to the AST samples, samples of water accumulated within the north and south containment areas of the AST Tank Farm were collected on December 14, 2006. The AST and water samples were transported to Gulf Coast Analytical Laboratories, Inc. (GCAL) in Baton Rouge, Louisiana for analysis for various waste characterization parameters (e.g., reactivity, corrosivity, ignitability, toxicity). The results of these analyses are summarized on attached Tables 1 through 4. The original laboratory reports for these analyses were included in a report describing the tank sampling activities that was submitted to EPA on April 4, 2007. A summary of the projected tank volumes based on the gauging estimates is provided in Table 5.

The AST and water sample data listed in Tables 1 through 4 will be used for the classification and profiling of waste streams for off-site management (treatment, disposal and/or recycling) as acceptable to the intended management facilities. Possible off-site waste management facilities are listed in Table 6. All materials will be managed at a facility that is in compliance with EPA's "Off-Site Rule". Should more recent or additional data be required by these facilities or the tank removal contractor, additional sampling and analyses will be performed as described below. In addition, one sample will be collected from the accumulated water within each of the north and south containment areas to evaluate possible discharge or other management options for that material. Sampling of accumulated sludge (if any) within the containment berms will be performed as necessary.

Tank Gauging – Prior to sampling or content removal (if sampling is not required), each AST will be gauged to verify the approximate content volume. For gauging and sampling purposes, the tanks will be accessed utilizing ladders and/or man lifts. Gauging will be performed using various devices, such as weighted lines, gauge

rulers, visible means, or other appropriate method based on the tank size and location, content characteristics, and content volume.

Sample Collection – Samples will be collected using dippers, sampling thieves and/or other sampling devices as appropriate depending on tank size, content type (solid or liquid) and content volume in order to obtain a representative sample. One representative sample will be collected from each tank waste stream. Containment area water and sludge samples will be collected directly from the containment areas using dippers, bailers, and/or other appropriate devices.

All sampling equipment will be decontaminated prior to use. Disposable equipment meant to be used only once and discarded will be decontaminated prior to use, unless the equipment is properly packaged and sealed. All non-disposable components of the sampling equipment will be decontaminated as follows:

- Potable water rinse;
- Liqui-nox® detergent wash;
- DI water rinse;
- Liqui-nox® detergent wash;
- DI water rinse; and
- Air dry.

A methanol or hexane rinse may be used if evidence of organic staining is found after equipment has been cleaned. Following decontamination, the sampling equipment will be placed in bags or sealed to keep the equipment clean during storage. All liquids generated as a result of decontamination processes will be containerized and handled as investigation-derived waste (IDW).

Samples will be transferred from the sampling devices to sample containers in a central staging area near the AST Tank Farm. Sample containers will be prepared specifically for the required analyses by the analytical laboratory. Any required preservatives will be placed in the sample containers by the laboratory prior to shipment to the Site.

To prevent misidentification of samples, labels will be affixed to each sample container. Information will be written on the label with a permanent marker. The labels will be sufficiently durable to remain legible even when wet and will contain the following information:

- Sampling identification name;
- Name or initials of collector;
- Date and time of collection;
- Analysis required (if space on label allows); and
- Preservative inside bottle, if applicable.

Sample custody, packaging and shipment will be performed in accordance with Standard Operating Procedure (SOP) No. 6 in the approved Gulfco RI/FS Field Sampling

Plan (FSP) (PBW, 2006a). Samples will be placed in shipping coolers containing bagged, cubed ice immediately following collection. Samples will be shipped to the laboratory via an overnight courier service, generally on the day they are collected.

Evidence of collection, shipment, and laboratory receipt must be documented on a Chain-of-Custody record by the signature of the individuals collecting, shipping and receiving each sample. A sample is considered in custody if it is:

- In a person's actual possession;
- In view, after being in physical possession;
- Sealed so that no one can tamper with it, after having been in physical custody; and/or
- In a secured area restricted to authorized personnel.

Chain-of-Custody Records will be used, by all personnel, to record the collection and shipment of all samples. The Chain-of-Custody Record may specify the analyses to be performed and should contain at least the following information:

- Name and address of originating location of samples;
- Name of laboratory where samples are sent;
- Any pertinent directions/instructions to laboratory;
- Sample type (e.g., aqueous);
- Listing of all sample bottles, size, identification, collection date and time, and preservative, if any, and type of analysis to be performed by the laboratory;
- Sample ID;
- Date and time of sample collection; and
- Signature of collector as relinquishing, with date/time.

The Chain-of-Custody procedure will be as follows:

1) The field technician collecting the sample shall be responsible for initiating the Chain-of-Custody Record. Samples can be grouped for shipment on a common form.

2) Each time responsibility for custody of the samples changes, the receiving and relinquishing custodians will sign the record and note the date and time.

3) The Chain-of-Custody Record shall be sealed in a watertight container, placed in the shipping container, and the shipping container sealed prior to giving it to the carrier. The carrier waybill shall serve as an extension of the Chain-of-Custody Record between the final field custodian and receipt in the laboratory. The commercial carrier is not considered part of the COC chain and is not required to sign the COC.

4) Upon receipt in the laboratory, a designated individual shall open the shipping containers, measure and record cooler temperature, compare the contents with the

Chain-of-Custody Record, and sign and date the record. Any discrepancies shall be noted on the Chain-of-Custody Record.

5) If discrepancies occur, the samples in question shall be segregated from normal sample storage and the project manager will be notified for clarification.

6) Chain-of-Custody Records, including waybills, if any, shall be maintained as part of the project records.

Sample Analyses - The analytical suite for AST and accumulated sludge samples (if any) will be determined based on the requirements of the removal action contractor and/or the off-site waste management facility to be used for the specific waste stream to be evaluated. Based on the previous data in Table 4, the containment area water samples will be analyzed for volatile organic compounds (VOCs), pesticides and metals using the methods listed for water samples in the approved RI/FS FSP. Considering the intended use of these data, validation will be performed at Data Review Level 2 as described in the approved Gulfco RI/FS Quality Assurance Project Plan QAPP (PBW, 2006b). Sample analyses will be performed by GCAL, whose laboratory QAPP was provided as Appendix G of the RI/FS QAPP. All analytical data collected for this removal action shall be provided electronically to EPA.

Construction Quality Assurance Plan

The Construction Quality Assurance Plan (CQAP) for the removal action at the AST Tank Farm is provided below. This plan describes the project-specific components of the performance methods and quality assurance program to ensure that the completed project meets or exceeds all design criteria, plans, and specifications.

Responsibilities and Authorities - The Construction Quality Assurance (CQA) Officer will be Eric Pastor, P.E. of Pastor, Behling & Wheeler, LLC (PBW). Mr. Pastor will be assisted in the day-to-day project inspection activities by other PBW personnel, all of whom will have an appropriate level of engineering and/or consulting experience for their assigned responsibilities. EPA and/or its contractors may perform additional construction inspection/oversight at EPA's discretion.

CQA Qualifications - Mr. Pastor's and PBW's qualifications were provided to EPA in a letter dated August 26, 2005. As noted above, all inspection personnel will have an appropriate level of engineering and/or consulting experience for their assigned responsibilities.

CQA Inspection and Verification Activities – A CQA inspector will be on-site to monitor the performance of all tank content removal, truck loading, tank decontamination, and tank demolition activities; verify compliance with environmental requirements; and ensure compliance with all health and safety procedures. The CQA inspector will verify that removal action activities have been performed in accordance with this Work Plan and the project specifications. A CQA inspector will also collect the containment berm water and sludge (if any) samples as described above. CQA

inspection documentation will be performed in accordance with SOP No. 1 provided in Appendix A of the approved RI/FS FSP. This documentation will be retained in the project files in accordance with the requirements of Section XI of the AOC.

Regulatory Compliance Plan

In accordance with the National Contingency Plan, removal actions under Section 106 of CERCLA are required to meet the substantive requirements of other laws unless an ARAR waiver is granted by the lead regulatory agency. Compliance with the administrative requirements (e.g., permitting, administrative reviews, reporting, and record keeping) of other laws is not required under CERCLA. The substantive ARARs are divided into the three categories:

- Chemical-specific requirements, health- or risk-based numerical values, or methodologies that specify the acceptable amount or concentration of a chemical that may be found in, or discharged to, the environment;

- Location-specific requirements- restrictions placed on the types of activities that can be conducted or on the concentration of hazardous substances that can be present solely because of the location where they will be conducted; and

- Action-specific requirements- technology or activity-based requirements or limitations on actions taken with respect to hazardous wastes.

Chemical-specific requirements – The primary chemical-specific requirements for the removal action at the AST Tank Farm are the chemical-specific waste classification standards under 30 TAC 335 Subchapter R and the hazardous waste identification requirements in 40 CFR Part 261. These requirements will be used for the classification of the tank contents prior to removal and off-site management.

Location-specific requirements – No location-specific requirements were identified for this removal action.

Action-specific requirements – Action-specific requirements for the removal action at the Former AST Tank Farm include the following:

- OSHA requirements pertaining to hazardous waste operations (29 CFR Part 1910.120) will be followed during all on-site work.

- Texas Commission on Environmental Quality (TCEQ) standards for hazardous waste generators (30 TAC Chapter 335, Subchapter C), including the Land Disposal Restrictions (Chapter 335, Subchapter 0) for any wastes to be landfilled will apply. Procedures to be implemented for compliance with generator requirements include completion of a One-Time Shipment Request for Texas Waste Code For Shipment of Hazardous and Class 1 Waste (TCEQ Form 0757) and/or other required forms. Compliance with off-site waste shipment requirements including, U.S. Department of Transportation (DOT) regulations contained in 49 C.F.R. 173, and 179 and placarded regulations in 49 C.F.R. 172

will be ensured through the use of only permitted waste haulers. Compliance with off-site waste management requirements, including Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901, *et seq.* at 40 C.F.R. 260 *et seq.* and related Texas state requirements will be ensured through the use of only the potential facilities listed in Table 6. Compliance with the provisions of the NCP, 40 C.F.R. 300.440, with regard to EPA approval of the off-site waste management facilities will be performed through EPA approval of this Work Plan.

- TPDES Multi Sector General Permit (Permit No. TXR050000) requirements for Sector Q (Water Transportation) pertaining to discharge of stormwater will be considered in evaluating the potential for discharge of water collected within the AST Tank Farm containment berms to the Intracoastal Waterway.

Waste Management Plan

The AST data listed in Tables 1 through 4, as supplemented by additional data collected through the sampling and analytical activities described in this Work Plan, will be used for the classification and profiling of waste streams for off-site management (treatment, disposal and/or recycling) as acceptable to the intended management facilities. Hazardous and non-hazardous wastes, as well as non-waste materials, shall be handled and managed in accordance with all applicable or relevant and appropriate requirements. To the extent possible based on tank content volumes, characteristics and waste classifications, the tank contents will be transferred directly from the tanks to the waste haulers (typically vacuum tankers) for liquid waste. Waste loads will be transported to one or more of the facilities listed in Table 6. All off-site transportation and management will be performed in accordance with applicable USDOT requirements. All materials will be managed at a facility that is in compliance with EPA's "Off-Site Rule". Wastewater from tank decontamination operations will be handled similarly. Following decontamination through triple rinsing, tanks not identified for re-use will be cut up and sold as scrap or disposed as non-hazardous waste. All loads will be properly manifested prior to leaving the Site.

Emissions Control Plan

During tank liquid content transfer operations, tank vapors will be vented through carbon canister or similar devices. Air exhaust from vacuum trucks and any other exhaust that potentially could contain volatile emissions shall be captured and treated onsite with vapor-phase carbon.

Ambient air monitoring will be periodically performed by the remediation contractor while tank contents are being transferred from the ASTs to trucks, and while gauging and sampling (if any) of the ASTs is being performed. Monitoring will be performed for total organic vapors using an organic vapor meter with a photoionization detector. During tank content transfer activities, additional monitoring may be performed using chemical-specific Draeger tubes. Monitoring measurements will be recorded by contractor personnel and will be included in the Final Report.

Contingency Plan

This contingency plan describes procedures to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste constituents, procedures to be followed in the event of a spill, and procedures to be followed for movement of equipment and personnel from low-lying areas during a high water event.

Spill Prevention – In order to minimize the potential for spills or release of hazardous constituents to the environment, liquid tank contents will be transferred directly to transport trucks when possible. Potential spills at the tanks during this process will be contained by the existing tank containment berms. Receiving trucks will be loaded within temporary loading areas constructed to contain potential spills during the loading process. Spill control and cleanup kits along with fire extinguishers and eye wash kits will be located in the AST Tank Farm and loading areas.

Spill Response/Notification – In the event of a spill, field crews will immediately contain the spill as necessary to prevent a release and notify on-site CQA and EPA representatives. If not on-site, the EPA RPM or OSC will be notified immediately thereafter. In the event of any spill which causes or threatens a release of waste material from the Site that constitutes an emergency situation or may present an immediate threat to public health or welfare or the environment, the Regional Duty Officer, Prevention and Response Branch, EPA Region 6, 214-665-3166, and the EPA Regional Emergency 24-hour telephone number, 1-866-372-7745, will be notified if the RPM/OSC is not available. In addition, in the event of any release of a hazardous substance from the Site which, pursuant to Section 103 of CERCLA, requires reporting to the National Response Center, the National Response Center will be contacted at (800) 424-8802. A written report will be submitted to EPA within 7 days after each such release, setting forth the events that occurred and the measures taken or to be taken to mitigate any release or endangerment caused or threatened by the release and to prevent the recurrence of such a release.

Site Activities during High Water Event – In the event that a high water condition (storm surge or hurricane) is predicted for the Site during the performance of the Work, the remediation contractor will take appropriate precautions to secure tanks, staging areas and equipment. Depending on the specific conditions, these precautions may include evacuation of the Site. The remediation contractor and the CQA officer will work closely with the EPA representatives to determine the appropriate precautions to be taken on a case by case basis depending on the timing and severity of the predicted high water conditions.

Health and Safety Plan

Prior to Site mobilization, the remediation contractor for the AST Tank Farm removal action will prepare a HASP in accordance with EPA's Standard Operating Safety Guide (PUB 9285.1-03, PB 92-963414, June 1992) and all currently applicable regulations found at 29 CFR 1910.120. The HASP will ensure the protection of the

public health and safety during performance of the removal action and will be submitted to EPA for review. Changes to the plan recommended by EPA will be incorporated into the final plan that will be implemented during the pendency of the removal action. All requirements under the Occupational Safety and Health Act (OSHA) of 1970, 29 U.S.C. § 651 et seq., and under the laws of the State approved under Section 18 of the Federal OSHA laws, as well as other applicable safety and health requirements, will be followed. Federal OSHA requirements include Hazardous Materials Operation, 20 CFR § 1910, as amended by 54 Fed. Reg. 9317 (March, 1989), all OSHA General Industry (29 CFR § 1910) and Construction (29 CFR § 1926) standards wherever they are applicable, as well as OSHA record keeping and reporting regulations, and the EPA regulations set forth in 40 CFR § 300, relating to the conduct of work at Superfund sites.

Schedule

Following selection of a remediation contractor, and all appropriate notifications, the AST Tank Farm removal action will be implemented as described herein. The HASP will be submitted within 14 days of EPA's approval of the remediation contractor and notice to proceed with the tank removal action. Tank content and containment area water/sludge sampling will be performed within 30 days of EPA's approval to proceed (and no sooner than 14 days after advance notification to EPA of the planned sampling activity unless shorter notice is agreed to by EPA). Following receipt/validation of sample analytical data, and necessary disposal facility approval for acceptance of tank content waste streams, mobilization for tank content removal and associated activities will be performed. Depending on Site and weather conditions, it is anticipated that field activities may be completed within approximately 45 days. The Final Report (described below) will be submitted within 45 days after receipt of all necessary documentation (including transporter and disposal facility manifests, weigh tickets, etc.).

B. Mobilization and Site Preparation

Mobilization and site preparation will involve mobilizing personnel, equipment, supplies and incidentals onto the project site; establishing all offices and facilities necessary to implement the project; and preparation of the site for the construction work. The major components of site preparation are:

- Utility Connections - Supplying electrical and potable water sources within the work area limits.
- Clearing and Grubbing - Clearing and grubbing and/or mowing areas as required for access to the work and surrounding areas and for constructing roads, work areas, and staging areas.
- Temporary Road Construction - Constructing temporary roads as necessary to provide access and egress to the site, and access and egress to the work areas.
- Work/Staging Area - Constructing work, staging and containment areas.

C. Removal Action Activities

AST Tank Farm removal action activities will consist of the following tasks:

Task 1 – Accumulated Water Removal – The purpose of this task is to remove any water accumulated within the containment berms in order to facilitate subsequent removal action activities. Data from water samples will be compared to TPDES Multi Sector General Permit (Permit No. TXR050000) requirements for Sector Q (Water Transportation). If the water sample concentrations do not exceed these criteria, the water will be discharged directly to the Intracoastal Waterway. If the water sample concentrations exceed these criteria, then the water will be transported for off-site management at one of the facilities listed in Table 6, or another facility approved in advance by EPA. This task will include the following:

a. Sample and analyze the accumulated water, as needed, to confirm previous data, evaluate management options and facilitate removal;

b. As necessary, transfer the water to temporary storage tanks to allow the removal action to continue pending determination of water discharge/management options;

c. Appropriately manage (discharge or otherwise manage) the accumulated water based on the sample analyses and management option evaluation, in accordance with all applicable state and federal regulations; and

d. Secure all records documenting the water characterization and subsequent management.

Task 2 – Container Content Removal and Disposal - The purpose of this task is to remove residual materials within AST Tank Farm containers followed by off-site management. Specifically, the liquid and sludge/solid contents of the above-ground storage tanks will be removed from the tanks and either recycled or disposed at one of the potential facilities listed in Table 6. To the extent possible based on tank content volumes, characteristics and waste classifications, the liquid tank contents will be transferred directly from the tanks to the waste haulers (typically vacuum tankers). The removal method for the tank contents will be determined after selection of the remedial contractor and will be selected and implemented to control volatile emissions. Debris that is encountered will be removed by suitable methods and placed into lined roll-off containers that will be covered except while the debris is being added. Transport of residual containerized materials/wastes to appropriate off-site management facilities will be performed in accordance with all applicable state and federal regulations. All records documenting the waste stream characteristics, classifications, quantities and final management locations will be secured as part of this task.

Task 3 – Container Removal - The purpose of this task is to remove containers associated with former Site operations (e.g., ASTs and drums) from the AST Tank Farm area. The following activities will be performed as part of this task:

a. Evaluate the potential for re-use of containers. Based on this evaluation, identify containers for re-use and containers for demolition and disposal/recycling;

b. Decontaminate containers intended for re-use. Develop decontamination procedures on a container-specific basis considering former content characteristics and process knowledge. Manage all decontamination fluids in accordance with applicable state and federal regulations. Document decontamination procedures used;

c. Remove re-usable containers from the Site following proper decontamination. Document recipient of container to be reused; and

d. Decontaminate and demolish all containers not suitable for re-use. Demolition may be performed on or off-site. Secure a certificate of destruction for each item demolished. Transport tank demolition debris off-site for recycling or disposal.

Task 4 – AST Containment Area Decontamination - The purpose of this task is to decontaminate the former AST containment areas. The following activities will be performed as part of this task:

a. Sample and analyze residual sludge (if any) within the containment berms to evaluate management options and facilitate waste classification (if needed);

b. Remove and manage the sludge (if any) in accordance with all applicable state and federal regulations;

c. Thoroughly pressure-wash the concrete floor and berms of the former AST Tank Farm and manage all washwater in accordance with all applicable state and federal regulations.

d. Demolish sections of the concrete containment berms at multiple locations as needed to preclude potential future water accumulation within this area (the number, area and locations where the berms will be demolished will be determined after an evaluation of water flow/accumulation patterns within the containment area during the pressure washing); and

e. Secure all records documenting the sludge characterization and subsequent management.

D. Emissions Control

The emissions control plan described above will be implemented throughout the removal and material-handling phases of the removal action to control air emissions. As noted therein, the air exhaust from any vacuum trucks and any other exhaust that potentially could contain volatile emissions (not including routine motor vehicle/construction equipment exhaust) will be captured and treated onsite with vapor-phase carbon.

E. Site Restoration and Demobilization

After completion of the removal action, the temporary roads and work areas will be dismantled and removed. Personnel, equipment, office trailer, supplies and incidentals that were used on the removal project will be removed from the site, unless required for the completion of other work at the Site.

F. Preparation of Final Report

A Final Report will be submitted within 45 days after receipt of all necessary documentation (including transporter and disposal facility manifests, weigh tickets, etc.). The Final Report will summarize the activities performed and will be submitted to the RPM/OSC for review and approval. The Final Report will include a listing of quantities and types of materials removed off-site or handled on-site, a discussion of removal and disposal options considered for those materials removed, a listing of the ultimate destination(s) of those materials, a presentation of the analytical results of all sampling and analyses performed, and accompanying appendices containing all relevant documentation generated during the removal action.

III. WORK TO BE PERFORMED – FORMER SURFACE IMPOUNDMENTS CAP REPAIR

An evaluation of the existing former surface impoundments cap was performed as part of the RI/FS. This evaluation involved the drilling and sampling of four borings through the cap, geotechnical testing of representative cap material (clay) samples, and performance of a field inspection of the cap, including observation of desiccation cracks, erosion features, and overall surface condition. The locations of the geotechnical soil borings are shown on Figure 2. These borings were drilled using direct push methods with soil samples collected for visual inspection and logging using a butyrate-lined, split-spoon sampler. Shelby tube samples for geotechnical testing were collected from a separate, immediately adjacent boring. These soil samples were tested to evaluate the construction materials and thickness of the cap. As shown in Table 7, the cap thicknesses at the four boring locations ranged from 2.5 feet to greater than 3.5 feet. The geotechnical properties (Atterberg Limits and Percent Passing # 200 Sieve) of the cap material as listed in Table 7 are consistent with those recommended for industrial landfill cover systems in TCEQ Technical Guideline No. 3 (TCEQ, 2004) and the vertical hydraulic conductivities were all better (i.e., less) than the TCEQ guideline value of 1 x 10^{-7} cm/sec.

A detailed field inspection of the cap was performed on August 3, 2006. The cap appeared to be in generally good condition with no significant desiccation cracks or erosion features observed on the cap surface or slopes. The cap surface consisted of a partially vegetated, crushed oyster shell surface overlying the clay layer. Some sporadic indications of animal (e.g., crab) penetrations of the cap surface were observed. Occasional debris (e.g., scrap wood and telephone poles) was present on the surface and several large bushes (approximate height of three feet) were observed, mostly near the cap edges. Drilling rig and other heavy equipment (i.e., support truck) traffic across the western end of the cap in conjunction with Site investigation activities has resulted in surface rutting of the cap in this area.

A. Preconstruction Activities

Preconstruction activities for the former surface impoundments cap repair will consist of cap inspection and assessment, preparation of cap repair engineering drawings and technical specifications, and preparation of a HASP. A topographical survey of the cap vicinity performed in conjunction with Site RI/FS activities is shown on Figure 2. The engineering drawings and technical specifications will be submitted to EPA for review and approval prior to contractor mobilization for the cap repair work. The HASP will be prepared in compliance with Occupational Safety and Health Administration and EPA requirements. The HASP will be submitted to EPA and will be in place prior to any onsite construction activities.

Sampling and Analysis Plan

Sample collection and testing associated with the former surface impoundments cap repair is summarized below. Additional details regarding sample collection and testing will be provided in the engineering drawings and technical specifications to be provided to EPA for review and approval prior to mobilization.

Sample Collection - Consistent with the cap repair objective to protect the cap's integrity by reestablishing the 3-foot thickness of the clay cover, one or more representative samples of borrow soils to be used as part of the clay cap repair will be collected for geotechnical testing. Samples will be collected using a shovel or other appropriate device directly from the proposed borrow area.

Sample Analyses - The borrow area soil sample(s) will be tested as follows:

- Soil classification using ASTM Method D2487
- Atterberg Limits (Liquid Limit, Plastic Limit and Plasticity Index) using ASTM Method D4318
- Moisture-Density Relationship using ASTM D698 (Standard Proctor)
- Hydraulic Conductivity using ASTM D5084

Construction Quality Assurance Plan

The CQAP for the former surface impoundments cap repair is provided below. This plan describes the project-specific components of the performance methods and quality assurance program to ensure that the completed project meets or exceeds all design criteria, plans, and specifications.

Responsibilities and Authorities - The CQA Officer will be Eric Pastor, P.E. of PBW. Mr. Pastor will be assisted in the day-to-day project inspection activities by other PBW personnel, all of whom will have an appropriate level of engineering and/or consulting experience for their assigned responsibilities. Field compaction of the clay material placed as part of the cap repair will be tested by a geotechnical testing subcontractor to PBW. Surface elevations of the existing clay cap and the final repaired clay cap will be determined by a Texas licensed surveying subcontractor at an appropriate number of control points to verify that the required additional lift thickness of 0.5 feet (see task descriptions below) has been attained. The final elevation of the overlying vegetated soil layer (see discussion below) will also be surveyed. EPA and/or its contractors may perform additional construction inspection/oversight at EPA's discretion.

CQA Qualifications - Mr. Pastor's and PBW's qualifications were provided to EPA in a letter dated August 26, 2005. As noted above, all PBW inspection personnel will have an appropriate level of engineering and/or consulting experience for their assigned responsibilities. Qualifications for the surveying subcontractor (Doyle & Wachstetter, Inc.) were provided to EPA in a letter dated April 24, 2007. Qualifications for the geotechnical testing subcontractor will be provided to EPA prior to mobilization.

CQA Inspection and Verification Activities – A CQA inspector will be on-site to monitor the performance of cap repair activities; verify compliance with the engineering design and technical specifications; and ensure compliance with all health and safety procedures. The CQA inspector will verify that the cap repair activities have been performed in accordance with this Work Plan and the project specifications. The geotechnical testing subcontractor will verify that compaction of the clay layer placed above the existing clay cap as part of repair activities conforms to the project specifications. The frequency and methods to be used for such testing will be detailed in the technical specifications to be provided to EPA prior to mobilization. Final surface elevations of the repaired clay cap, verification that the additional clay lift meets the project specifications, and the final elevation of the overlying vegetated soil layer will be determined by the surveying subcontractor. CQA inspection documentation will be performed in accordance with SOP No. 1 provided in Appendix A of the approved RI/FS FSP. This documentation will be retained in the project files in accordance with the requirements of Section XI of the AOC.

Regulatory Compliance Plan

As noted previously, removal actions under Section 106 of CERCLA are required to meet the substantive requirements of other laws unless an ARAR waiver is granted by the lead regulatory agency. Substantive ARARs of potential interest to the former surface impoundments cap repair include the location- and action-specific requirements discussed below. No chemical-specific requirements were identified for the cap repair activities.

Location-specific requirements – Location-specific requirements for the cap repair include the following:

- Much of the area adjacent to the north, west and east sides of the former surface impoundments is identified as wetlands on the USFWS Wetlands Inventory Map (USFWS, 2008). Potential ARARs associated with wetlands are described in EPA's Considering Wetlands at CERCLA Sites (EPA, 1994). As described therein, a primary potential ARAR related to wetlands is Section 404(b)(1) of the Clean Water Act (CWA), promulgated as regulation in 40 CFR 230.10, which generally prohibits discharge of dredged or fill material to wetlands, subject to consideration of practicable alternatives and the use of mitigation measures. Per 40 CFR 6.302(a), Executive Order 11990 further requires that any activities performed within wetland areas minimize the destruction, loss, or degradation of wetlands. Care will be taken during the cap repair work to keep impacts on adjacent wetlands to a minimum, and to restore wetland areas that may be temporarily impacted during repair activities following completion of the cap repair work.

- The former surface impoundments and surrounding area are located within the 100-year coastal floodplain. Per 40 CFR 6.302(b), Executive Order 11988 requires that any actions performed within the floodplain avoid adverse effects,

minimize potential harm, and restore and preserve natural and beneficial values of the floodplain. Care will be taken during the cap repair work to comply with these requirements.

Action-specific requirements – Action-specific requirements for the cap repair include the following:

- OSHA requirements pertaining to hazardous waste operations (29 CFR Part 1910.120) will be followed during all on-site work.

- The substantive Texas Pollutant Discharge Elimination System (TPDES) requirements for storm water discharge from construction sites apply to the cap repair work. The applicable requirements, which may include: (1) filing of a Notice of Intent (NOI) for coverage under TPDES General Permit No. TXR150000; (2) preparation of a storm water pollution prevention plan (SWPPP); and (3) compliance with the General Permit and SWPPP technical requirements, will be followed during all on-site cap repair work.

Waste Management Plan

The primary wastes anticipated to be generated by cap repair work are inert materials, such as brush and debris removed from the existing cap surface and the thin oyster shell surface layer. These materials will either be placed directly into waste haulers for transport to the non-hazardous disposal facility listed in Table 6, or will be temporarily stored in on-site roll-off bins for subsequent transport to the disposal facility. All off-site transportation and management will be performed in accordance with applicable USDOT requirements. All materials will be managed at a facility that is in compliance with EPA's "Off-Site Rule".

Emissions Control Plan

No appreciable air emissions, except for routine exhaust from vehicles and construction equipment, are anticipated during the cap repair work. Dust may be generated during clearing/grubbing and oyster shell layer removal activities. Dust control through water application and/or other measures will be performed as necessary to keep dust generation to a minimum. As a result, no air or dust monitoring during the cap repair work is proposed.

Contingency Plan

This contingency plan describes procedures to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste constituents, procedures to be followed in the event of a spill, and procedures to be followed for movement of equipment and personnel from low-lying areas during a high water event.

Spill Prevention – Since no liquid wastes and no hazardous wastes will be handled during the cap repair work, the potential for spills is anticipated to be low. The

greatest spill potential may be during on-site refueling/maintenance of construction equipment, or from releases from equipment hydraulic lines if a rupture were to occur. Spill control and cleanup kits along with fire extinguishers and eye wash kits will be located in the work area as a contingency for such potential spills.

Spill Response/Notification – In the event of a spill, field crews will immediately contain the spill as necessary to prevent a release and notify on-site CQA and EPA representatives. If not on-site, the EPA RPM or OSC will be notified immediately thereafter. In the event of any spill which causes or threatens a release of waste material from the Site that constitutes an emergency situation or may present an immediate threat to public health or welfare or the environment, the Regional Duty Officer, Prevention and Response Branch, EPA Region 6, 214-665-3166, and the EPA Regional Emergency 24-hour telephone number, 1-866-372-7745, will be notified if the RPM/OSC is not available. In addition, in the event of any release of a hazardous substance from the Site which, pursuant to Section 103 of CERCLA, requires reporting to the National Response Center, the National Response Center will be contacted at (800) 424-8802. A written report will be submitted to EPA within 7 days after each such release, setting forth the events that occurred and the measures taken or to be taken to mitigate any release or endangerment caused or threatened by the release and to prevent the recurrence of such a release.

Site Activities during High Water Event – In the event that a high water condition (storm surge or hurricane) is predicted for the Site during the performance of the cap repair work, the construction contractor will take appropriate precautions to secure the work area and equipment. Depending on the specific conditions, these precautions may include evacuation of the Site. The contractor and the CQA officer will work closely with the EPA representatives to determine the appropriate precautions to be taken on a case by case basis depending on the timing and severity of the predicted high water conditions.

Health and Safety Plan

Prior to Site mobilization, the contractor for the former surface impoundments cap repair will prepare a HASP in accordance with EPA's Standard Operating Safety Guide (PUB 9285.1-03, PB 92-963414, June 1992) and all currently applicable regulations found at 29 CFR 1910.120. The HASP will ensure the protection of the public health and safety during performance of the removal action and will be submitted to EPA for review. Changes to the plan recommended by EPA will be incorporated into the final plan that will be implemented during the pendency of the removal action. All requirements under the OSHA, 29 U.S.C. § 651 et seq., and under the laws of the State approved under Section 18 of the Federal OSHA laws, as well as other applicable safety and health requirements, will be followed. Federal OSHA requirements include Hazardous Materials Operation, 20 CFR § 1910, as amended by 54 Fed. Reg. 9317 (March, 1989), all OSHA General Industry (29 CFR § 1910) and Construction (29 CFR § 1926) standards wherever they are applicable, as well as OSHA record keeping and reporting regulations, and the EPA regulations set forth in 40 CFR § 300, relating to the conduct of work at Superfund sites.

Schedule

Following selection of a construction contractor, and all appropriate notifications, the cap repair will be implemented as described herein. The HASP will be submitted within 14 days of EPA's approval of the construction contractor and notice to proceed with the cap removal action. Engineering drawings and technical specifications will be submitted within 30 days of EPA's approval to proceed. Following EPA approval of the engineering drawings and technical specifications, mobilization for the cap repair work will be performed. Depending on Site and weather conditions, it is anticipated that field activities may be completed within approximately 45 days. The Final Report (described below) will be submitted within 45 days after receipt of all necessary documentation (including final survey drawings, final field density testing reports, etc.).

B. Mobilization and Site Preparation

Mobilization and site preparation will involve mobilizing personnel, equipment, supplies and incidentals onto the project site; establishing all offices and facilities necessary to implement the project; and preparation of the site for the construction work. The major components of site preparation are:

- Utility Connections - Supplying electrical and potable water sources as necessary.
- Clearing and Grubbing - Clearing and grubbing and removal of surface debris from the existing cap and adjacent area as required for access to the work and for constructing roads, work areas, and staging areas.
- Temporary Road Construction - Constructing temporary roads as necessary to provide access and egress to the site, and access and egress to the work areas.
- Work/Staging Area - Constructing work, staging and containment areas as necessary.

C. Removal Action Activities

Former surface impoundment cap repair activities will consist of the tasks described below. Additional task details will be provided in the engineering drawings and technical specifications to be submitted for EPA review and approval as described previously.

Task 1 – Debris, Brush and Shell Layer Removal – The purpose of this task is to remove all surficial material above the existing clay cap and thus allow reestablishment of the 3-foot cap thickness. Material to be removed includes debris (e.g., scrap wood and telephone poles), vegetation, and the surficial oyster shell layer. These materials will be removed from the existing cap and from adjacent areas as necessary to facilitate cap repair. As noted above, this inert material will be transported for off-site disposal as a non-hazardous waste. This task will be considered complete when the entire surface of the existing clay cap has been exposed and the resultant surface elevations have been

surveyed by the surveying subcontractor at a sufficient number of control points to allow subsequent verification of the thickness of the clay layer placed above the existing clay cap in Task 2, below.

Task 2 – Imported Clay Placement and Compaction - The purpose of this task is to reestablish the 3-foot thickness of the compacted clay cap. Imported clay from an identified borrow area will be tested for the geotechnical properties as described previously. This material will then be placed over the entire surface of the existing cap in a single lift and compacted as necessary to achieve the project specifications, as confirmed by field testing. The compacted lift will be at least 0.5 feet in thickness as confirmed by post-compaction elevation survey of the aforementioned control points by the surveying subcontractor. The final grading plan for the compacted clay surface will be provided in the engineering drawings and technical specifications.

Task 3 – Topsoil Layer Placement and Vegetation - The purpose of this task is to establish a vegetated surface to protect the clay cap and facilitate run-off from the cap area. As such, this task includes the importation of topsoil from an off-site borrow source and placement of the topsoil in an approximately one-foot thick uncompacted lift. The topsoil will then be seeded with an appropriate mixture of grasses for Site conditions, and mulched and irrigated as necessary to establish vegetation. The final grading plan for the final cap surface will be provided in the engineering drawings and technical specifications. A topographic survey of the final cap surface will be performed by surveying subcontractor.

D. Site Restoration and Demobilization

After completion of the cap repair work, any temporary roads and work areas will be dismantled and removed. Personnel, equipment, office trailer, supplies and incidentals that were used on the removal project will be removed from the site, unless required for the completion of other work at the Site.

E. Preparation of Final Report

A Final Report will be submitted within 45 days after receipt of all necessary documentation (including final survey, contractor quantity documentation, etc.). The Final Report will summarize the activities performed and will be submitted to the RPM/OSC for review and approval. The Final Report will include a description and an as built survey of the repaired cap, copies of all laboratory and field testing results, and accompanying appendices containing all relevant documentation generated during the removal action.

IV. REFERENCES

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TABLES

Table 1
Gulfco Former AST Tank Farm
Tank Sample - RCI/Toxicity Data

Tank No.	Sample ID.	Physical Description	pH	Reactivity Sulfide	Reactivity Cyanide	Flashpoint	Arsenic	Barium	Benzene	Cadmium	Carbon Tetrachloride
				ppm	ppm	Deg. F.	mg/L	mg/L	mg/L	mg/L	mg/L
Tank No. 2	TK-2-O	Aqueous Phase	NA	NA	NA	NA	<0.0024	12.1	<0.177	NA	NA
	TK-2-O	Organic Phase	5.95	112	<250	>212	<0.0024	8.19	0.415 J	0.0033 B	<0.013
	TK-2-S	Solids- sand, debris, etc.	NA	NA	NA	NA	<0.0024	2.82	24.1	0.0038 B	<0.256
Tank No. 4	TK-4-A	Oily Water	7.4	<96	<250	>212	<0.0024	29.7	<0.000177	0.016	<0.000336
Tank No. 6	TK-6-S	Rust Solids	NA	NA	NA	NA	<0.0024	0.89 B	<0.009	0.002 B	<0.00512
Tank No. 13	TK-13-O	Oily sludge	6.89	80	<250	>212	<0.0024	0.27 B	13.8	<0.00022	<0.128
Tank No. 14	None	Empty (2 in. of rust solids)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tank No. 15	TK-15-O	Oily sludge	6.38	<80	<250	126	<0.0024	0.22 B	5.3	<0.00022	<0.00512
Tank No. 16	TK-16-O	Oily sludge	6.31	<80	<250	>212	<0.0024	0.39 B	<0.009	<0.00022	<0.00512
Tank No. 17	TK-17-S	Rust solids	NA	NA	NA	NA	<0.0024	0.56 B	<0.009	0.0012 B	<0.00512
Tank No. 18	TK-18-O	Light Organic Phase	3.37	<417	<250	90	<0.024	0.53 B	<9	<0.0022	<5.12
Tank No. 19	TK-19-O	Oily sludge	6.75	216	<250	104	<0.0024	1.33	<4.5	<0.00022	<2.56
Tank No. 21	TK-21-A	Oily water	8.5	<80	<250	>212	<0.0024	0.0021 B	51.6 J	<0.00022	<5.12
Tank No. 22	TK-22-O	Oily sludge	6.74	<80	<250	>212	<0.0024	0.28 B	<0.009	<0.00022	<0.00512
Tank No. 23	TK-23-O (mg/kg)	Appears to be diesel	6.72	160	<250	126	<0.16	0.26B	<2.08	<0.013	<2.4
North Containment Area	Dike North	Water	NA	NA	NA	NA	0.012	1.17	0.011	<0.00019	0.00889 J
South Containment Area	Dike South	Water	NA	NA	NA	NA	0.024	0.49	0.015	<0.00019	<0.000336
Hazardous Criteria			</= 2 or >/= 12.5	>/= 500	>/= 250	<140	5	100	0.5	1	0.5

Table 1
Gulfco Former AST Tank Farm
Tank Sample - RCI/Toxicity Data

Tank No.	Sample ID.	Physical Description	Chlordane	Chlorobenzene	Chloroform	Chromium	o-Cresol	m,p-Cresol	Cresol	1,2-Dichloroethane	1,4-Dichlorobenzene	2,4-D
			mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Tank No. 2	TK-2-O	Aqueous Phase	NA	<0.162	1.5 J	0.16	<0.409	<0.368	NA	7.97	<0.0538	NA
	TK-2-O	Organic Phase	<0.00008	<0.021	2.25	<0.0012	<0.0012	<0.0014	<0.003	8.4	<0.0011	<0.0027
	TK-2-S	Solids- sand, debris, etc.	<0.00008	<0.426	20.7	0.0045 B	0.00275 J	<0.0014	0.00414 J	203	<0.0011	<0.0027
Tank No. 4	TK-4-A	Oily Water	NA	<0.000162	<0.00018	<0.0012	<0.00327	<0.00295	NA	<0.000176	<0.000538	<0.00027
Tank No. 6	TK-6-S	Rust Solids	<0.00008	<0.00852	<0.00776	<0.0012	<0.0012	<0.0014	<0.003	<0.0082	<0.0011	<0.0027
Tank No. 13	TK-13-O	Oily sludge	<0.00008	<0.213	1.32 J	<0.0012	<0.0012	0.00143 J	<0.003	2.73 J	<0.0011	<0.0027
Tank No. 14	None	Empty (2 in. of rust solids)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tank No. 15	TK-15-O	Oily sludge	<0.00008	<0.00852	<0.00776	<0.0012	<0.013 J	<0.0014	0.013 J	<0.0082	<0.0011	<0.0027
Tank No. 16	TK-16-O	Oily sludge	<0.00008	<0.00852	<0.00776	<0.0012	<0.0012	0.037 J	0.037 J	<0.0082	<0.0011	<0.0027
Tank No. 17	TK-17-S	Rust solids	<0.0004	<0.00852	<0.00776	<0.0012	<0.0012	<0.0014	<0.003	<0.0082	<0.0011	<0.0027
Tank No. 18	TK-18-O	Light Organic Phase	<0.01431	<8.52	216	<0.012	<0.1764	<0.2134	<0.444	<8.2	<0.1577	<0.0027
Tank No. 19	TK-19-O	Oily sludge	<0.00008	<4.26	<3.88	<0.0012	0.0046 J	<0.0014	0.00486 J	<4.1	<0.0011	<0.0027
Tank No. 21	TK-21-A	Oily water	<0.00008	<8.52	2100	<0.0012	<0.0012	<0.0014	<0.003	224	<0.0011	<0.0027
Tank No. 22	TK-22-O	Oily sludge	<0.00008	<0.00852	<0.00776	<0.0012	<0.0012	0.00364 J	0.00364 J	<0.0082	<0.0011	<0.0027
Tank No. 23	TK-23-O (mg/kg)	Appears to be diesel	NA	<3.31	<2.83	<0.049	NA	NA	NA	<2.28	<8.44	NA
North Containment Area	Dike North	Water	NA	<0.000324	0.095	0.0028 B	<0.000327	<0.000295	NA	0.045	<0.00108	<0.0027
South Containment Area	Dike South	Water	NA	<0.000162	0.03	0.0031 B	<0.000327	<0.000295	NA	0.00304 J	<0.000538	<0.00027
Hazardous Criteria			0.03	100	6	5	200	200	200	0.5	7.5	10

Table 1
Gulfco Former AST Tank Farm
Tank Sample - RCI/Toxicity Data

Tank No.	Sample ID.	Physical Description	1,1-Dichloroethene	2,4-Dinitrotoluene	Endrin	Heptachlor	Heptachlor Epoxide	Hexachlorobenzene	Hexachlorobutadiene	Hexachloroethane	Lead
			mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Tank No. 2	TK-2-O	Aqueous Phase	<0.205	<0.579	NA	NA	NA	<0.32	<0.45	<1.05	<0.0013
	TK-2-O	Organic Phase	<0.023	<0.0036	<0.00007	<0.00004	<0.00005	<0.0015	<0.0017	<0.0016	0.043 B
	TK-2-S	Solids- sand, debris, etc.	<0.458	<0.0036	<0.00007	<0.00004	<0.0005	<0.0015	<0.0017	<0.0016	0.0084 B
Tank No. 4	TK-4-A	Oily Water	<0.000205	<0.00464	<0.0000832	<0.0000439	0.00065	<0.00256	<0.00045	<0.00842	0.28
Tank No. 6	TK-6-S	Rust Solids	<0.00916	<0.0036	<0.00007	<0.00004	<0.00005	<0.0015	<0.0017	<0.0016	0.0028 B
Tank No. 13	TK-13-O	Oily sludge	<0.229	<0.0036	<0.00007	<0.00004	0.00057	<0.0015	<0.0017	<0.0016	0.0035 B
Tank No. 14	None	Empty (2 in. of rust solids)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tank No. 15	TK-15-O	Oily sludge	<0.00916	<0.0036	<0.00007	<0.00004	<0.00005	<0.0015	<0.0017	<0.0016	<0.0013
Tank No. 16	TK-16-O	Oily sludge	<0.00916	<0.0036	<0.00007	<0.00004	<0.00005	<0.0015	<0.0017	<0.0016	<0.0013
Tank No. 17	TK-17-S	Rust solids	<0.00916	<0.0036	<0.00033	<0.00019	<0.00024	<0.0015	<0.0017	<0.0016	0.022 B
Tank No. 18	TK-18-O	Light Organic Phase	<9.16	<0.5339	<0.01182	0.029 J	<0.00862	<0.2179	<0.248	<0.2358	<0.013
Tank No. 19	TK-19-O	Oily sludge	<4.58	<0.0036	<0.00007	<0.00004	<0.00005	<0.0015	<0.0017	<0.0016	0.0056 B
Tank No. 21	TK-21-A	Oily water	<9.16	<0.0036	<0.00007	<0.00004	<0.00005	<0.0015	<0.0017	<0.0016	<0.0013
Tank No. 22	TK-22-O	Oily sludge	<0.00916	<0.0036	<0.00007	<0.00004	<0.00005	<0.0015	<0.0017	<0.0016	<0.0013
Tank No. 23	TK-23-O (mg/kg)	Appears to be diesel	<3.19	NA	NA	NA	NA	NA	<24.9	NA	<0.097
North Containment Area	Dike North	Water	<0.000411	<0.000464	<0.00000832	<0.00000439	<0.00000732	<0.000256	<0.0009	<0.000842	<0.0013
South Containment Area	Dike South	Water	<0.000205	<0.000464	<0.00000832	<0.00000439	0.0000329	<0.000256	<0.00045	<0.000842	0.0044 B
Hazardous Criteria			0.7	0.13	0.02	0.008	0.008	0.13	0.5	3	5

Table 1
Gulfco Former AST Tank Farm
Tank Sample - RCI/Toxicity Data

Tank No.	Sample ID.	Physical Description	Lindane	Mercury	Methoxychlor	MEK	Nitrobenzene	Pentachlorophenol	Pyridine	Selenium	Silver
			mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Tank No. 2	TK-2-O	Aqueous Phase	<0.00003	0.00004	NA	13.4	<0.452	<1.33	<0.437	0.03 B	<0.0006
	TK-2-O	Organic Phase	<0.00003	0.00037	<0.00032	9.77	<0.0008	<0.0037	<0.0182	<0.0046	<0.0006
	TK-2-S	Solids- sand, debris, etc.	<0.00003	0.00014 B	<0.00032	30	<0.0008	<0.0037	<0.0182	<0.0046	<0.0006
Tank No. 4	TK-4-A	Oily Water	0.00035	0.00017 B	0.0018 J	0.011	<0.00362	<0.011	<0.00349	<0.0046	<0.0006
Tank No. 6	TK-6-S	Rust Solids	<0.00003	0.00013 B	<0.00032	<0.017	<0.0008	<0.0037	<0.0182	0.014 B	<0.0006
Tank No. 13	TK-13-O	Oily sludge	<0.00003	0.00012 B	<0.00032	<0.429	<0.0008	<0.0037	<0.0182	0.006 B	<0.0006
Tank No. 14	None	Empty (2 in. of rust solids)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tank No. 15	TK-15-O	Oily sludge	<0.00003	0.00039	<0.00032	0.085 J	<0.0008	<0.0037	<0.0182	0.0095 B	<0.0006
Tank No. 16	TK-16-O	Oily sludge	<0.00003	0.00011 B	<0.00032	0.367	<0.0008	<0.0037	<0.0182	0.013 B	<0.0006
Tank No. 17	TK-17-S	Rust solids	0.0185	0.00015 B	<0.00162	<0.017	<0.0008	<0.0037	<0.0182	<0.0046	<0.0006
Tank No. 18	TK-18-O	Light Organic Phase	<0.00556	<0.0048	<0.05816	<17.2	<0.1262	<0.5607	<2.74	0.88 B	<0.006
Tank No. 19	TK-19-O	Oily sludge	<0.00003	0.00008 B	<0.00032	<8.58	<0.0008	<0.0037	<0.0182	0.0064 B	<0.0006
Tank No. 21	TK-21-A	Oily water	<0.00003	0.00012 B	<0.00032	<17.2	<0.0008	<0.0037	<0.0182	<0.0046	<0.0006
Tank No. 22	TK-22-O	Oily sludge	<0.00003	0.00013 B	<0.00032	0.874	<0.0008	<0.0037	<0.0182	0.0067 B	<0.0006
Tank No. 23	TK-23-O (mg/kg)	Appears to be diesel	NA	0.011	NA	<6.25	NA	NA	NA	1.6B	<0.047
North Containment Area	Dike North	Water	<0.00000255	<0.00004	<0.00000214	<0.00217	<0.000362	<0.00106	<0.000349	0.0049 B	<0.0006
South Containment Area	Dike South	Water	<0.00000255	<0.00004	<0.00000214	<0.00109	<0.000362	<0.00106	<0.000349	<0.0046	<0.0006
Hazardous Criteria			0.4	0.2	10	200	2	100	5	1	5

Table 1
Gulfco Former AST Tank Farm
Tank Sample - RCI/Toxicity Data

Tank No.	Sample ID.	Physical Description	Tetrachloroethylene	Toxaphene	Trichloroethylene	2,4,5-Trichlorophenol	2,4,6-Trichlorophenol	2,4,5-TP (Silvex)	Vinyl Chloride
			mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Tank No. 2	TK-2-O	Aqueous Phase	<0.768	NA	0.851 J	<0.508	<0.525	NA	<0.383
	TK-2-O	Organic Phase	<0.023	<0.00025	1.52	<0.001	<0.0021	<0.0016	0.247 J
	TK-2-S	Solids- sand, debris, etc.	55.7	<0.00025	205	<0.001	<0.0021	<0.0016	0.247 J
Tank No. 4	TK-4-A	Oily Water	<0.000768	<0.00275	0.00102 J	<0.00406	<0.00042	<0.00013	<0.000383
Tank No. 6	TK-6-S	Rust Solids	<0.00908	<0.00025	0.027 J	<0.001	<0.0021	<0.0016	<0.00356
Tank No. 13	TK-13-O	Oily sludge	47.7	<0.00025	2.98 J	<0.001	<0.0021	<0.0016	0.988 J
Tank No. 14	None	Empty (2 in. of rust solids)	NA	NA	NA	NA	NA	NA	NA
Tank No. 15	TK-15-O	Oily sludge	<0.00908	<0.00025	<0.011	<0.001	<0.0021	<0.0016	<0.00356
Tank No. 16	TK-16-O	Oily sludge	<0.00908	<0.00025	<0.011	<0.001	<0.0021	<0.0016	<0.00356
Tank No. 17	TK-17-S	Rust solids	<0.00908	<0.00125	<0.011	<0.001	<0.0021	<0.0016	<0.00356
Tank No. 18	TK-18-O	Light Organic Phase	<9.08	<0.045	<10.8	<0.1552	<0.3149	<0.0016	<3.56
Tank No. 19	TK-19-O	Oily sludge	<4.54	<0.00025	<5.4	<0.001	<0.0021	<0.0016	<1.78
Tank No. 21	TK-21-A	Oily water	<9.08	<0.00025	<10.8	<0.001	<0.0021	<0.0016	<3.56
Tank No. 22	TK-22-O	Oily sludge	<0.00908	<0.00025	<0.011	<0.001	<0.0021	<0.0016	<0.00356
Tank No. 23	TK-23-O (mg/kg)	Appears to be diesel	<3.85	NA	<3.55	NA	NA	NA	<7.03
North Containment Area	Dike North	Water	0.00627 J	<0.000275	0.018	<0.000406	<0.00042	<0.00013	<0.000765
South Containment Area	Dike South	Water	<0.000768	<0.000275	<0.000702	<0.000406	<0.00042	<0.00013	<0.000383
Hazardous Criteria			0.7	0.5	0.5	400	2	1	0.2

Table 1
Gulfco Former AST Tank Farm
Tank Sample - RCI/Toxicity Data

Tank No.	Sample ID.	Physical Description	Comments
Tank No. 2	TK-2-O	Aqueous Phase	Total Data
	TK-2-O	Organic Phase	TCLP Data
	TK-2-S	Solids- sand, debris, etc.	TCLP Data
Tank No. 4	TK-4-A	Oily Water	Total Data
Tank No. 6	TK-6-S	Rust Solids	TCLP Data
Tank No. 13	TK-13-O	Oily sludge	TCLP Data
Tank No. 14	None	Empty (2 in. of rust solids)	
Tank No. 15	TK-15-O	Oily sludge	TCLP Data
Tank No. 16	TK-16-O	Oily sludge	TCLP Data
Tank No. 17	TK-17-S	Rust solids	TCLP Data
Tank No. 18	TK-18-O	Light Organic Phase	TCLP Data
Tank No. 19	TK-19-O	Oily sludge	TCLP Data
Tank No. 21	TK-21-A	Oily water	TCLP Data
Tank No. 22	TK-22-O	Oily sludge	TCLP Data
Tank No. 23	TK-23-O (mg/kg)	Appears to be diesel	Total Data (mg/kg)
North Containment Area	Dike North	Water	Total Data
South Containment Area	Dike South	Water	Total Data
Hazardous Criteria			

Table 2
Gulfco Former AST Tank Farm
Tank Sample TPH/PCB Data

Tank No.	Sample ID.	Physical Description	C6-C12	>C12-C28	>C28-C35	Total TPH (C6-C35)	Arachlor-1016	Arachlor-1221	Arachlor-1232	Arachlor-1242	Arachlor-1248
Tank No. 4	TK-4-A	Oily Water	16.7J	130	<26.6	147	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005
Tank No. 6	TK-6-S	Rust Solids	<100	1,140	1,630	2,770	<1.2	<1.2	<1.2	<1.2	<1.2
Tank No. 13	TK-13-O	Oily sludge	<10	468,000	275,000	743,000	<120	<120	<120	<120	<120
Tank No. 15	TK-15-O	Oily sludge	135,000	719,000	197,000	>99%	<1.2	<1.2	<1.2	<1.2	<1.2
Tank No. 16	TK-16-O	Oily sludge	<20	761,000	512,000	>99%	<1.2	<1.2	<1.2	<1.2	<1.2
Tank No. 17	TK-17-S	Rust solids	<111	880	360	1,240	<1.33	<1.33	<1.33	<1.33	<1.33
Tank No. 18	TK-18-O	Light Organic Phase	961,000	37,800	<50	999,000	<1.2	<1.2	<1.2	<1.2	<1.2
Tank No. 19	TK-19-O	Oily sludge	59,600	441,000	128,000	629,000	<1.2	<1.2	<1.2	<1.2	<1.2
Tank No. 21	TK-21-A	Oily water	<20	51,400	266,000	780,000	<99.3	<99.3	<99.3	<99.3	<99.3
Tank No. 22	TK-22-O	Oily sludge	<20	789,000	449,000	>99%	<1.2	<1.2	<1.2	<1.2	<1.2
Tank No. 23	TK-23-O	Appears to be diesel	260,000	1,230,000	<50	>99%	<1.2	<1.2	<1.2	<1.2	<1.2
North Containment Area	Dike North	Water	<5.42	2.5J	<5.42	2.5J	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005
South Containment Area	Dike South	Water	<5.36	<5.36	<5.36	<16.1	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005

Table 2
Gulfco Former AST Tank Farm
Tank Sample TPH/PCB Data

Tank No.	Sample ID.	Physical Description	Arachlor-1254	Arachlor-1260	Comments
Tank No. 4	TK-4-A	Oily Water	<0.0005	<0.0005	mg/L
Tank No. 6	TK-6-S	Rust Solids	<1.2	<1.2	mg/kg
Tank No. 13	TK-13-O	Oily sludge	<120	<120	mg/kg
Tank No. 15	TK-15-O	Oily sludge	<1.2	<1.2	mg/kg
Tank No. 16	TK-16-O	Oily sludge	<1.2	<1.2	mg/kg
Tank No. 17	TK-17-S	Rust solids	<1.33	<1.33	mg/kg
Tank No. 18	TK-18-O	Light Organic Phase	<1.2	<1.2	mg/kg
Tank No. 19	TK-19-O	Oily sludge	<1.2	<1.2	mg/kg
Tank No. 21	TK-21-A	Oily water	<99.3	<99.3	mg/kg
Tank No. 22	TK-22-O	Oily sludge	<1.2	<1.2	mg/kg
Tank No. 23	TK-23-O	Appears to be diesel	<1.2	<1.2	mg/kg
North Containment Area	Dike North	Water	<0.0005	<0.0005	mg/L
South Containment Area	Dike South	Water	<0.0005	<0.0005	mg/L

Table 3
Gulfco Former AST Tank Farm
TK-21-A Sample Total Concentrations - Detected Values

Parameter	Concentration (mg/kg)
VOCs	
1,2-Dichloroethane	663
Benzene	121 J
Chloroform	6,850
Isopropylbenzene (Cumene)	119 J
Methylene chloride	241 J
Toluene	179 J
SVOCs	
2-Methylnapthalene	145 B
Benzaldehyde	123 J
Biphenyl	54.4 J
Bis(2-Ethylhexyl)phthalate	36.5 J
Caprolactum	2,410
Crysene	23.3 J
Fluorene	82.7 J
Phenanthrene	283
Pyrene	85.5 J
Metals	
Barium	7.09
Cadmium	0.062 J
Calcium	304
Chromium	2.28
Iron	1,660
Lead	2.44
Manganese	9.61
Mercury	0.027
Selenium	0.92 J
Silver	0.12 J
TPH (TX 1005)	
>C12-C28	514,000
>C28-C35	266,000
Total TPH	780,000
Pesticides/Herbicides	
Endosulfan I	1.25 J
Endosulfan II	3.72 J
Endrin aldehyde	2.9 J
Endrin ketone	9.6 J
gamma-Chlordane	3.1 J
2,4,5-T	0.446 J

Notes:
1. Only chemicals of interest detected above the sample detection limit are included in
2. Data qualifiers: J = Estimated value for organics. B = detected in blank sample.

Table 4
Gulfco Former AST Tank Farm
North and South Containment Dike Sample Analytical Results

Parameter	Dike North	Dike South
VOCs	**mg/L**	**mg/L**
1,1,1,2-Tetrachloroethane	<0.000965	<0.000482
1,1,1-Trichloroethane	0.031	<0.000461
1,1,2,2-Tetrachloroethane	<0.00024	<0.00012
1,1,2-Trichloroethane	<0.000665	<0.000333
1,1-Dichloroethane	0.00244 J	<0.000237
1,1-Dichloroethene	<0.000411	<0.000205
1,1-Dichloropropene	<0.00058	<0.00029
1,2,3-Trichloropropane	<0.00145	<0.000726
1,2,4-Trichlorobenzene	<0.000422	<0.000211
1,2,4-Trimethylbenzene	0.0037 J	0.00939
1,2-Dibromo-3-chloropropane	<0.00038	<0.00019
1,2-Dibromoethane	<0.000539	<0.000269
1,2-Dichlorobenzene	<0.000801	<0.000401
1,2-Dichloroethane	0.045	0.00304 J
1,2-Dichloropropane	<0.000507	<0.000254
1,3,5-Trimethylbenzene	<0.000422	0.00235 J
1,3-Dichlorobenzene	<0.00063	<0.000315
1,3-Dichloropropane	<0.000511	<0.000255
1,4-Dichlorobenzene	<0.00108	<0.000538
2,2-Dichloropropane	<0.000532	<0.000266
2-Butanone	<0.00217	<0.00109
2-Chloroethylvinyl ether	<0.00109	<0.000547
2-Chlorotoluene	<0.000603	<0.000301
2-Hexanone	<0.000823	<0.000412
4-Chlorotoluene	<0.000661	<0.000331
4-Isopropyltoluene	<0.000242	<0.000121
4-Methyl-2-pentanone	<0.0000996	<0.0000498
Acetone	<0.00382	0.021 J
Acrolein	<0.00403	<0.00201
Acrylonitrile	<0.00646	<0.00323
Benzene	0.011	0.015
Bromobenzene	<0.000641	<0.000321
Bromodichloromethane	<0.000289	<0.000145
Bromoform	<0.000755	<0.000377
Bromomethane	<0.00155	<0.000774
Carbon disulfide	<0.000487	<0.000244
Carbon tetrachloride	0.00889 J	<0.000336
Chlorobenzene	<0.000324	<0.000162
Chloroethane	<0.00115	<0.000574
Chloroform	0.095	0.03
Chloromethane	<0.00129	<0.000645
cis-1,2-Dichloroethene	0.00513 J	<0.000292
cis-1,3-Dichloropropene	<0.00033	<0.000165
Cyclohexane	0.00293 J	0.000936 J
Dibromochloromethane	<0.000455	<0.000228
Dibromomethane	<0.000756	<0.000378

Table 4
Gulfco Former AST Tank Farm
North and South Containment Dike Sample Analytical Results

Parameter	Dike North	Dike South
VOCs (cont'd)		
Dichlorodifluoromethane	<0.000677	<0.000339
Ethylbenzene	0.011	0.00135 J
Hexachlorobutadiene	<0.0009	<0.00045
Isopropylbenzene (Cumene)	0.00453 J	0.000515 J
m,p-Xylene	0.00292 J	0.011
Methyl Acetate	<0.00169	<0.000847
Methyl iodide	<0.000841	<0.00042
Methylcyclohexane	<0.000378	<0.000189
Methylene chloride	0.012 J	0.000765 J
Naphthalene	0.023	0.096
n-Butyl alcohol	<0.05	<0.025
n-Butylbenzene	<0.000561	<0.000281
n-Propylbenzene	<0.000609	<0.000305
o-Xylene	0.00189 J	0.00476 J
sec-Butylbenzene	<0.000598	<0.000299
Styrene	<0.000304	<0.000152
tert-Butyl methyl ether (MTBE)	<0.000358	<0.000179
tert-Butylbenzene	<0.000573	<0.000287
Tetrachloroethene	0.00627 J	<0.000768
Toluene	0.00791 J	0.033
trans-1,2-Dichloroethene	<0.000747	<0.000374
trans-1,3-Dichloropropene	<0.000359	<0.00018
trans-1,4-Dichloro-2-butene	<0.00143	<0.000717
Trichloroethene	0.018	<0.000702
Trichlorofluoromethane	<0.00051	<0.000255
Trichlorotrifluoroethane	<0.00072	<0.00036
Vinyl acetate	<0.000756	<0.000378
Vinyl chloride	<0.000765	<0.000383
Xylene (total)	0.00481 J	0.016
SVOCs		
1,2Diphenylhydrazine/Azobenzen	<0.000204	<0.000204
2,4,5-Trichlorophenol	<0.000406	<0.000406
2,4,6-Trichlorophenol	<0.00042	<0.00042
2,4-Dichlorophenol	<0.000387	<0.000387
2,4-Dimethylphenol	<0.00131	<0.00131
2,4-Dinitrophenol	<0.00112	<0.00112
2,4-Dinitrotoluene	<0.000464	<0.000464
2,6-Dinitrotoluene	<0.00041	<0.00041
2-Chloronaphthalene	<0.000343	<0.000343
2-Chlorophenol	<0.000344	<0.000344
2-Methylnaphthalene	<0.000102	<0.000102
2-Nitroaniline	<0.000267	<0.000267
2-Nitrophenol	<0.000522	<0.000522
3,3'-Dichlorobenzidine	<0.00208	<0.00208
3-Nitroaniline	<0.0004	<0.0004
4,6-Dinitro-2-methylphenol	<0.000284	<0.000284
4-Bromophenyl phenyl ether	<0.000366	<0.000366
4-Chloro-3-methylphenol	<0.000408	<0.000408

Table 4
Gulfco Former AST Tank Farm
North and South Containment Dike Sample Analytical Results

Parameter	Dike North	Dike South
SVOCs (cont'd)		
4-Chloroaniline	<0.000786	<0.000786
4-Chlorophenyl phenyl ether	<0.000346	<0.000346
4-Nitroaniline	<0.000564	<0.000564
4-Nitrophenol	<0.00201	<0.00201
Acenaphthene	<0.000135	<0.000135
Acenaphthylene	<0.0000884	<0.0000884
Acetophenone	0.00633 J	<0.000371
Aniline	<0.000556	<0.000556
Anthracene	<0.000102	<0.000102
Atrazine (Aatrex)	<0.00205	<0.00205
Benzaldehyde	<0.00121	<0.00121
Benzidine	<0.00718	<0.00718
Benzo(a)anthracene	<0.0000796	<0.0000796
Benzo(a)pyrene	<0.00015	<0.00015
Benzo(b)fluoranthene	<0.000165	<0.000165
Benzo(g,h,i)perylene	<0.000141	<0.000141
Benzo(k)fluoranthene	<0.0000662	<0.0000662
Benzoic acid	<0.001	<0.001
Benzyl alcohol	<0.000442	<0.000442
Biphenyl	<0.000341	<0.000341
Bis(2-Chloroethoxy)methane	<0.000241	<0.000241
Bis(2-Chloroethyl)ether	<0.00047	<0.00047
Bis(2-Chloroisopropyl)ether	<0.000528	<0.000528
Bis(2-Ethylhexyl)phthalate	<0.00191	<0.00191
Butyl benzyl phthalate	<0.000356	<0.000356
Caprolactam	<0.00258	<0.00258
Carbazole	<0.000293	<0.000293
Chrysene	<0.0000563	<0.0000563
Dibenz(a,h)anthracene	<0.000257	<0.000257
Dibenzofuran	<0.00032	<0.00032
Diethyl phthalate	<0.000257	<0.000257
Dimethyl phthalate	<0.000206	<0.000206
Di-n-butyl phthalate	<0.000944	<0.000944
Di-n-octyl phthalate	<0.000889	<0.000889
Fluoranthene	<0.000155	<0.000155
Fluorene	<0.00011	<0.00011
Hexachlorobenzene	<0.000256	<0.000256
Hexachlorocyclopentadiene	<0.000597	<0.000597
Hexachloroethane	<0.000842	<0.000842
Indeno(1,2,3-cd)pyrene	<0.000158	<0.000158
Isophorone	<0.00024	<0.00024
m,p-Cresol	<0.000295	<0.000295
Nitrobenzene	<0.000362	<0.000362
n-Nitrosodimethylamine	<0.00101	<0.00101
n-Nitrosodi-n-propylamine	<0.000313	<0.000313
n-Nitrosodiphenylamine	<0.00051	<0.00051
o-Cresol	<0.000327	<0.000327
Pentachlorophenol	<0.00106	<0.00106

Table 4
Gulfco Former AST Tank Farm
North and South Containment Dike Sample Analytical Results

Parameter	Dike North	Dike South
SVOCs (cont'd)		
Phenanthrene	<0.000137	<0.000137
Phenol	<0.000325	<0.000325
Pyrene	<0.0000899	<0.0000899
Pyridine	<0.000349	<0.000349
Metals		
Arsenic	0.012	0.024
Barium	1.17	0.49
Cadmium	<0.00019	<0.00019
Calcium	45.4	7.36
Chromium	0.0028 B	0.0031 B
Hardness	192	34.9
Iron	0.6	1.52
Lead	<0.0013	0.0044 B
Manganese	0.034	0.043
Mercury	<0.00004	<0.00004
Selenium	0.0049 B	<0.0046
Silver	<0.0006	<0.0006
TPH (TX 1005)		
>C12-C28	2.5 J	<0.815
>C28-C35	<0.824	<0.815
C6-C12	<0.249	<0.247
Total TPH (C6-C35)	2.5 J	<1.88
Pesticides/Herbicides		
4,4'-DDD	0.00095	0.00021
4,4'-DDE	<0.00000556	0.00004 J
4,4'-DDT	0.00026	0.00027
Aldrin	<0.00000261	0.00000336 J
alpha-BHC	0.0000466	0.0000113 J
alpha-Chlordane	<0.00000274	<0.00000274
beta-BHC	<0.00000424	<0.00000424
delta-BHC	<0.00000232	<0.00000232
Dieldrin	0.0000427 J	<0.00000471
Endosulfan I	0.00022	0.0000508
Endosulfan II	0.00019	0.000043 J
Endosulfan sulfate	0.00095	0.0000878
Endrin	<0.00000832	<0.00000832
Endrin aldehyde	0.00037	<0.00000484
Endrin ketone	0.000053	<0.00000426
gamma-BHC (Lindane)	<0.00000255	<0.00000255
gamma-Chlordane	<0.00000542	<0.00000542
Heptachlor	<0.00000439	<0.00000439
Heptachlor epoxide	<0.00000732	0.0000329
Methoxychlor	<0.00000214	<0.00000214
Toxaphene	<0.000275	<0.000275
2,4,5-T	<0.00015	<0.00015
2,4,5-TP (Silvex)	<0.00013	<0.00013
2,4'-D	<0.00027	<0.00027

Table 4
Gulfco Former AST Tank Farm
North and South Containment Dike Sample Analytical Results

Parameter	Dike North	Dike South
PCBs		
Aroclor-1016	<0.000125	<0.000125
Aroclor-1221	<0.000115	<0.000115
Aroclor-1232	<0.0001	<0.0001
Aroclor-1242	<0.000125	<0.000125
Aroclor-1248	<0.000065	<0.000065
Aroclor-1254	<0.000105	<0.000105
Aroclor-1260	<0.00012	<0.00012
TDS/TSS		
Total Dissolved Solids(TDS)	976	973
Total Suspended Solids	15	11

Notes:

J = Estimated value for organics.
B = Estimated value for metals.

Table 5
Gulfco Former AST Tank Farm
Tank Content Projected Quantities

Tank No.	Description	Projected Quantity[1] (gallons)[2]
Tank No. 2	Organic/Aqueous Mixture Solids - sand, debris (cy)	1,600 10
Tank No. 4	Oily Water	13,000
Tank No. 6	Rust Solids (cy)	106
Tank No. 10	Empty	0
Tank No. 13	Oily sludge	3,000
Tank No. 14	Empty (2 in. of rust solids)	0
Tank No. 15	Oily sludge	40,000
Tank No. 16	Oily sludge	2,500
Tank No. 17	Empty (Minimal rust solids)	0
Tank No. 18	Light Organic Phase	3,000
Tank No. 19	Oily sludge	8,000
Tank No. 21	Oily water	55,500
Tank No. 22	Oily sludge	6,000
Tank No. 23	Appears to be diesel	375
Tank No. 100[3]	Empty	0
Totals	Liquid (gals) Solids (cy)	132,975 116

Notes:
[1] Projected quantity based on CHESI field measurements (12-06) and LTE, 1999 tank volumes.
[2]Quanitities are in gallons unless listed otherwise (cy of solids in Tank Nos. 2 and 6).
[3]Tank No. 100 (empty tank) removed by Hurricane Ike storm surge in September 2006.

Table 6
Gulfco Former AST Tank Farm
Potential Off-site Tank Content Management Facilities

Name	Type	Location	Permit(s)
Clean Harbors Environmental Services	Fuels Blending, Incinerator	Deer Park, Texas	TXD055141378
Waste Management - Coastal Plains	Landfill	Alvin, Texas	MSW Permit # 1721A
Waste Management - Lake Charles	Landfill	Sulphur, Louisiana	LAD000777201

Table 7
Gulfco Former Surface Impoundments Cap
Soil Sample Descriptions and Geotechnical Testing Data

Boring Location	Cap Material Description[1]	Observed Cap Thickness (ft)	Liquid Limit[2] (%)	Plastic Limit[2] (%)	Plasticity Index[2] (%)	Percent Passing # 200 Sieve[3] (%)	Moisture Content[4] (%)	Vertical Hydraulic Conductivity[5] (cm/sec)
ND1GT01	Sandy Lean Clay	2.9	48	16	32	70	20	3.5×10^{-8}
ND2GT02	Lean Clay with Sand	>3.5	49	14	35	84	23	1.4×10^{-8}
NE1GT03	Lean Clay with Sand	2.5	49	13	35	74	19	5.0×10^{-9}
NE2GT04	Fat Clay	3.6	58	15	43	88	26	5.9×10^{-9}
TCEQ Technical Guideline No. 3 Recommended Value/Range			--	--	10 - 35	>20	--	$<1.0 \times 10^{-7}$

Notes:
1. Crushed oyster shell surface observed above clay cap at all four boring locations.
2. ASTM Method D 4318
3. ASTM Method D 1140
4. ASTM Method D 2216
5. US Army Corps of Engineers, Engineering Manual Method 1110-2-1906

FIGURES

GULFCO MARINE MAINTENANCE
FREEPORT, BRAZORIA COUNTY, TEXAS

Figure 1

FORMER AST TANK FARM AREA MAP

PROJECT: 1352	BY: ZGK	REVISIONS
DATE: DEC., 2009	CHECKED: EFP	

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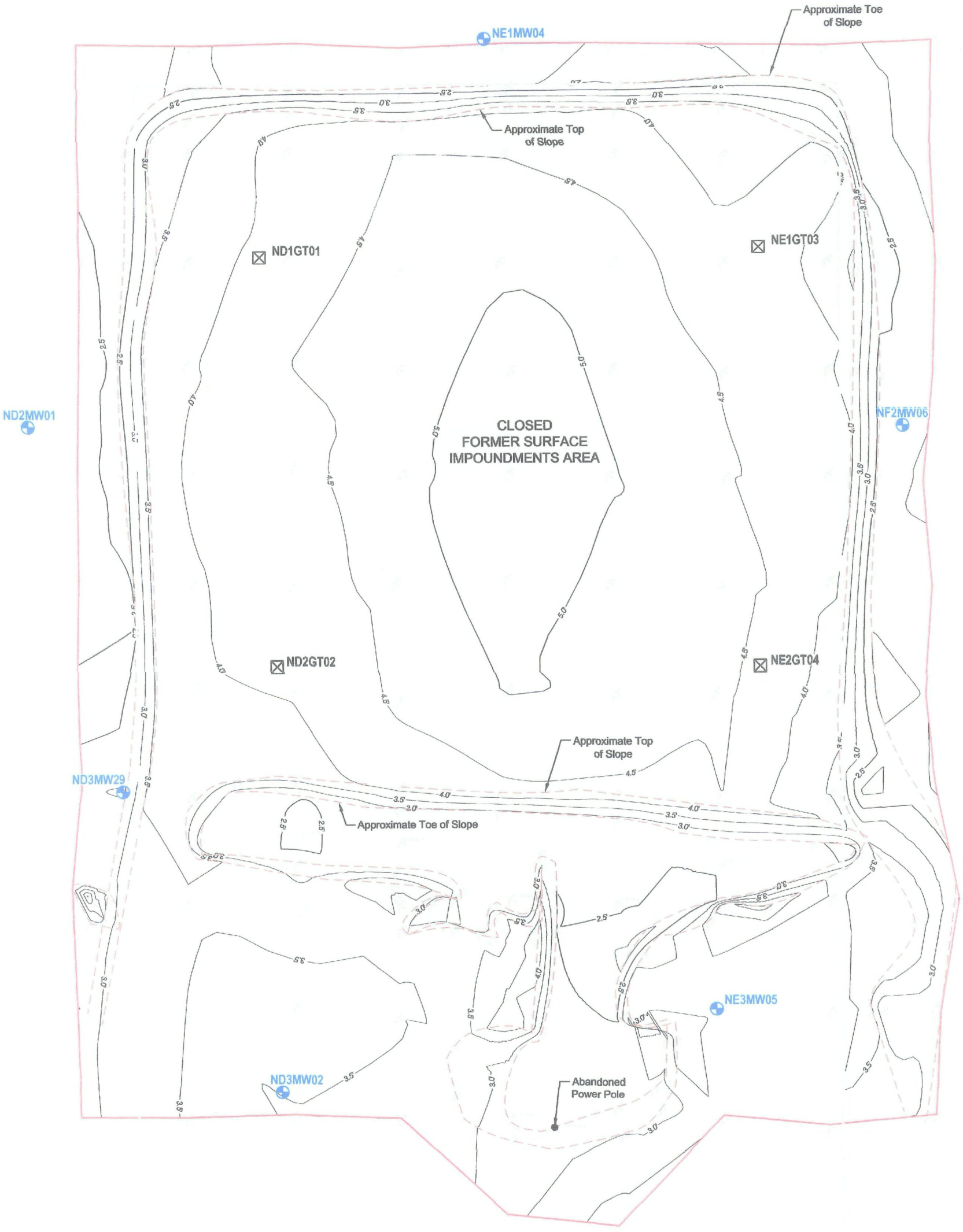
N

Approx. Scale in Feet

0 15 30

Note:
Tank numbers, except 100, from LTE, 1999. Tank 100 (empty tank) removed by Hurricane Ike storm surge in September 2008.

Source of photo: H-GAC, Texas aerial photograph, 2006.



EXPLANATION

- Monitoring Well Location
- Geotechnical Soil Boring
- Elevation Measurement Location
- 2.0' — Ground Surface Elevation (Ft Mean Sea Level, NGVD 29) - Minor Contour Line
- 2.5' — Ground Surface Elevation (Ft Mean Sea Level, NGVD 29) - Major Contour Line
- Top/Toe of Slope (Approximate)
- Lot 56 Property Line
- Limits of Topographic Survey

Source: Doyle & Wachtstetter, Inc. Field Survey May 26, 2009.

Approx. Scale in Feet

0 25 50

GULFCO MARINE MAINTENANCE
FREEPORT, BRAZORIA COUNTY, TEXAS

Figure 2

FORMER SURFACE IMPOUNDMENTS TOPOGRAPHIC MAP

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